



State of Ohio Environmental Protection Agency

Southwest District Office

2376

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George V. Voinovich, Governor  
Nancy P. Hollister, Lt. Governor  
Donald R. Schregardus, Director

July 7, 1999

Mr. Johnny Reising  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

Re: **ADDITIONAL COMMENTS ON IMPP CHANGE PAGES**

Dear Mr. Reising:

This letter provides conditional approval of the change pages to the Impacted Material Placement Plan. The condition of our approval is satisfactory resolution of the following issues:

- 1) Section 9.2.2 on page 9-1 has been changed to explicitly state that run-off from the impacted material haul road west of the OSDF may be routed to the OSDF equipment wash facility or to any other wastewater collection points acceptable to the Construction Manager. Impacted run-off should be handled in the storm water management system. These flows should not be routed to the OSDF equipment wash facility which drains into the Bio-Surge Lagoon via the Leachate Conveyance System. The BSL is being pushed to the limits of its capacity.
- 2) Our proposed change in original comment #9 reads, "Soft spots indicated by tire ruts deeper than three inches in depth or by visible deflection under the moving proof rolling equipment will be stabilized by additional passes of the compactor". The action to change the text ("...or visible deflection more than 3 inches...") allows visible deflections of less than 3 inches. Our intent was to require re-working soft spots that are indicated by visible deflection of any observable size.
- 3) Our original comment #7 addressed stockpiling Category 2 material within active cells. The proposed action is satisfactory but an additional paragraph should be added to Section 6.10 to formalize the on-going practice of stockpiling Category 1 materials within active cells. The text should limit this practice to the active construction year and should place duration and quantity limits on the stockpiled

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soils.

If you have any questions, please contact Tom Ontko or me.

Sincerely,

*for Tom Ontko*

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA  
Terry Hagen, FDF  
Mark Shupe, HSI GeoTrans  
Francie Hodge, Tetra Tech EM Inc.  
Ruth Vandergrift, ODH